



# BELL & POLLOCK, P.C.

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RECEIVED

MAR 17 1999

March 15, 1999

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SNELL & WILMER, LLP

Howard I. Sobelman  
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**Via Facsimile: (602) 382-6070**

Re: U.S. Patent App. Serial No: 09/105, 406.

Titled: Stored Value Transaction System including an Integrated Data Base Server,  
Filed June 26, 1998

Dear Mr. Sobelman:

I am in receipt of your March 5, 1999 letter. I have attempted several times to settle this matter amicably, however your offices continue to ignore my requests and threaten my clients.

Since the inception of this matter, I have repeatedly requested that either Ms. Rinearson and/or you provide the employment contracts for my clients, any and all documents which identify the scope of their employment while working for American Express, all documents concerning the compensation to them and establishing the basis upon which the compensation was provided, and all documents identifying all terms and conditions under which my clients employment with American Express ended. To date, neither you nor Ms. Rinearson has provided this office or my client with any of the requested information. To say the least, it is very suspicious that your office has continued to threaten my clients, yet completely ignores my requests. It is equally suspicious that when I requested said information, Ms. Rinearson referred us to your office, and in your March 5, 1999 letter, you affirmatively require that any request regarding employment should be forwarded to American Express (Ms. Rinearson). At this point in time, I can only assume that your office, American Express, and Ms. Rinearson are acting in bad faith and do not have documents or authority which support your position.

You repeatedly state that my clients have a legal obligation to cooperate with American Express and/or your office, however, it is impossible to determine the extent of my clients' legal obligation when Ms. Rinearson and your office refuse to produce the requested information.

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It is my understanding that American Express has attempted to proceed with prosecuting this patent application without my clients' signatures. If this is accurate, it only confirms my belief that your offices and/or Ms. Rinearson are attempting to manipulate the situation and are traveling down the path of bad faith. Please provide a complete copy of all documents which you have filed with the Patent office immediately.

Further, you have eluded to the fact that my clients are obligated to cooperate fully with American Express although you have yet to provide any specific or legal authority, contracts, and documents to confirm this obligation. Only after I have received this information can we make an informed decision with respect to your actions, threats, and demands. **PLEASE DISCLOSE THE INFORMATION REQUESTED** in my previous phone calls, letters, and in this letter.

I would like to make it abundantly clear that my clients intend to comply with the law, but if you do not produce the requested documentation, it is impossible to accurately assess my clients' rights and obligations. My clients are entitled to all the requested documentation and once this information is provided to us, we will act immediately. If this information is not provided, we can only assume that your threats are nothing more than a thinly veiled attempt to unlawfully take advantage of my clients and to take over a process to which American Express is not entitled.

Thank you for your attention to this matter.

Very truly yours,



Bradley P. Pollock, Esq.  
Bell & Pollock, P.C.

BPP/maw